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*Counsel for the Chen Group and
Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRICKMAN INVESTMENTS, INC.,
Individually And On Behalf of All Others
Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

DOCKET NUMBER: 07-cv-3455

HON. RICHARD J. HOLWELL

(Caption continued on the following page)

**MOTION OF THE CHEN GROUP TO CONSOLIDATE RELATED ACTIONS; TO BE
APPOINTED LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD
PLAINTIFF'S CHOICE OF COUNSEL**

GERALD BILGER, Individually And On Behalf
of All Others Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

ELIYAHU MOKHTAR, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

SHANNON VINSON, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

The Chen Group (or “Movant”) respectfully moves this Court for an order: (1) consolidating all related actions; (2) appointing Movant as Lead Plaintiff in this action pursuant to Section 27(a)(3)(B) of the Securities Act of 1933 (the “Securities Act”), as amended by Section 101(a) of the Private Securities Litigation Reform Act of 1995 (“PLSRA”); and (3) approving its selection of the law firm of Kahn Gauthier Swick, LLC, as Lead Counsel for the Class.

The Chen Group makes this Motion on the belief that it is the most “adequate plaintiff” as defined in the PSLRA because:

1. it has the largest financial interest in the relief sought by the Class and has incurred substantial losses in the amount of \$42,789.64 as a result of its purchases of Allot Communications, Ltd. stock during the Class Period, and
2. it satisfies the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

The Chen Group further requests that the Court approve the selection of its counsel, Kahn Gauthier Swick, LLC, (“KGS”), as Lead Counsel for the Class. This firm has actively investigated the allegations raised against Defendants. KGS is a nationally-recognized law firm with significant class action, fraud, and complex litigation experience, and is a firm with the resources to effectively and properly pursue this action.

WHEREFORE, for all of the reasons set forth herein and in the Memorandum of Law and the Miller Declaration submitted herewith, the Chen Group respectfully requests that this Court: (1) consolidate all related actions with the instant case; (2) appoint the Chen Group as Lead Plaintiff pursuant to Section 27(a)(3)(B) of the Securities Act of 1933, as amended by the PSLRA; (3) approve the Chen Group’s selection of Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: July 2, 2007

Respectfully submitted,

KAHN GAUTHIER SWICK, LLC

/s/ Kim E. Miller

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*Counsel for the Chen Group and Proposed
Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on July 2, 2007.

/s/ Kim E. Miller
Kim E. Miller